IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

UNIVERSITAS EDUCATION, LLC,	
Petitioner/Judgment Creditor,)
v.) Case No. 14-FJ-05-HE
NOVA GROUP, INC.,)
Respondent/Judgment Debtor,)
AVON CAPITAL, LLC,)
Respondent/Judgment Debtor,)
ASSET SERVICING GROUP, LLC,)
Respondent/Garnishee,)
SDM HOLDINGS, LLC,)
Respondent/Garnishee,)
and)
AVON CAPITAL, LLC, a Wyoming Limited Liability Company,)))
Intervenor.)

RECEIVER'S REPORT OCTOBER 2022

COMES NOW Ryan Leonard, Receiver of Avon Capital, LLC, a Wyoming limited liability company ("Avon Capital"), and pursuant to this Court's Order [Doc. No. 311], submits this Receiver's Report on the status of findings and activities of the Receiver in October 2022:

- 1. On September 22, 2021, this Court entered an Order appointing the undersigned as the Receiver for Avon Capital [Doc. No. 311]. Pursuant to the Court's Order, the Receiver is instructed to file monthly reports of the Receiver's findings and activities.
- 2. This Court's previous orders in this matter indicate that Avon Capital is the sole member of SDM Holdings LLC ("SDM"), which is a named beneficiary of approximately 300 life insurance policies, as well as a bank account held for the benefit of SDM by Asset Servicing Group, LLC ("ASG").
- 3. During the month of October 2022, the Receiver communicated with the Manager of SDM to keep updated on the status of all premium payments and other expenses, as well as all policy maturities.
- 4. The Receiver and Receiver's counsel reviewed and monitored the filings in this matter as well as the multiple appeals related to this matter.
- 5. Overall, the Receiver continues to actively assist in the management of the life insurance policies and monitor the premium payments from the ASG bank account.
- 6. During the month of October 2022, Universitas requested that the Receiver provide certain information related to the insurance policies. The Receiver in turn requested that Universitas provide a subpoena so that all interested parties would be aware of the request and have the ability to respond. A subpoena has subsequently been served on both the Receiver and ASG seeking information. Motions to quash the subpoenas have been filed by interested parties associated with Avon Capital (not the Receiver) and

Phoenix Charitable Trust. Those motions are pending before the Court and set for hearing on December 1, 2022.

Dated: November 28, 2022.

Respectfully submitted,

s/ Ryan Leonard

Ryan Leonard, Receiver 6301 N. Western Ave., Suite 250 Oklahoma City, OK 73118 (405) 702-9900 Rleonard@elbattorneys.com

CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2022, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

s/ Heidi J. Long

Heidi J. Long, Attorney for the Receiver